



HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NEW YORK 10007

JOSEPH M. HIRAOKA, JR.
Senior Counsel
jhiraoka@law.nyc.gov
Phone: (212) 356-2413
Fax: (212) 356-1148

March 15, 2024

BY ECF

Honorable Marcia M. Henry
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Adam White v. The City of New York, et al., 23 CV 6924 (RER)(MMH)

Your Honor:

I am a Senior Counsel in the Special Federal Litigation Division of the New York City Law Department, representing defendants City of New York, Sergeant Barrett, Sergeant Klenke, Officer Ali, Officer Kaur, Officer Phillips, Officer Rebolledocortes, and Officer Ullah ("City defendants"). I write with the consent of counsel for plaintiff and defendant Klein to respectfully request that City defendants' time to submit an opposition to plaintiff's Motion to Compel and for Sanctions be extended from March 19, 2024 to March 21, 2024. This is the first request for an extension of time to submit an opposition, and it will not affect any other deadlines.

City defendants have been working to prepare their opposition. However, the undersigned has been ill since last Tuesday, and has not been able to work at full capacity. The undersigned expects to be able work next week, but is not certain how much he will be able to work. Consequently, City defendants request an extension of time to file an opposition to March 21, 2024.

Thank you for your consideration.

Respectfully submitted,

Joseph M. Hiraoka, Jr.

Joseph M. Hiraoka, Jr.
Senior Counsel
Special Federal Litigation Division

cc: All Counsel (by ECF)